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To Mr. Josh Minges, Esquire

The Public Service Commission  
State of South Carolina  
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AUG 25 2020

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From Ms. Alley

FAX No. 701-335-7767

In Regard to Mrs. Alley vs. Dominion Energy South Carolina, Inc. with respect to the Dominion Energy South Carolina, Inc. "Smart Meter Upgrade Opt Out Medical Waiver" form

Reply to the Answer from Dominion Energy South Carolina, Inc.  
Answer to the Motion to Dismiss from Dominion Energy South Carolina, Inc.  
Docket No. 2020-186-E

The Complainant, Mrs. Alley, respectfully requests that the Public Service Commission of the State of South Carolina not dismiss the complaint because, contrary to the allegation made by Mr. Matthew W. Gissendanner of Dominion Energy South Carolina, Inc. in his letter dated 12 August 2020, we did state a claim upon which relief can very easily be granted.

Contrary to the denial made by Mr. Matthew W. Gissendanner of Dominion Energy South Carolina, Inc., the complainant definitely alleges that the company Dominion Energy South Carolina, Inc. has aspects of its "Smart Meter Upgrade Opt Out Medical Waiver" form which are discriminatory, dangerous, and in violation of the United States Constitution.

The Commerce Clause refers to article 1, section 8, clause 3 of the United States Constitution, which gives Congress the power "to regulate Commerce with foreign nations, and among the several states, and with the Indian Tribes;" Chief Justice Marshall in *Gibbons v. Ogden* qualified the word "intercourse" with the word "commercial" which kept the component of monetary transactions within the Commerce clause. Currently interstate commerce as covered by the Constitution and Supreme Court decisions covers every aspect of movement of persons and things (whether for profit or not) across state lines, every aspect of communication, every aspect of transmission of intelligence (whether for commercial purposes or not), every aspect of commercial negotiation that eventually will involve the transportation of persons or things, or the flow of services or power, across state lines.

Therefore, the movement of any individual from the state of South Carolina to another state to obtain medical care is covered under the commerce clause of the United States Constitution.

The "Dormant Commerce Clause" refers to the prohibition, which is understood in the Commerce Clause, against states passing legislation that discriminates against or excessively burdens

interstate commerce. Of specific significance is the prevention of protectionist state policies that favor state citizens or businesses at the expense of non-citizens conducting business.

The fact that the Dominion Energy South Carolina, Inc. "Smart Meter Upgrade Opt Out Medical Waiver" form requires that a person who lives in a residence in the State of South Carolina that has no choice but to obtain commercial electricity from Dominion Energy South Carolina, Inc. (i.e. which is a monopoly) must have his or her medical conditions and records reviewed and verified only by "a licensed Healthcare Provider in the State of South Carolina" violates the Commerce Clause of the United States Constitution by denying any such aforementioned person the ability to have a licensed healthcare provider from another state verify that person's medical conditions and records.

The excuse made by Dominion Energy South Carolina, Inc. that the content of and requirements of the "Smart Meter Upgrade Opt Out Medical Waiver" form cannot be contested is that it had been approved by the Public Services Commission of the State of South Carolina and was similar to a form that had been approved for Duke Energy Carolinas, LLC and Duke Energy Progress, LLC by the Public Services Commission of the State of South Carolina.

The fact that the Public Services Commission of the State of South Carolina permitted the Dominion Energy South Carolina, Inc. "Smart Meter Upgrade Opt Out Medical Waiver" form and a similar form approved for use by Duke Energy Carolinas, LLC and Duke Energy Progress, LLC to contain a requirement that violated the Commerce Clause of the United States Constitution does not negate the fact that the forms as written violate the United States Constitution.

The regulation passed by the Public Services Commission of the State of South Carolina permitting the Dominion Energy South Carolina, Inc. "Smart Meter Upgrade Opt Out Medical Waiver" form to discriminate against the interstate commerce of individuals within the State of South Carolina who live in residences where commercial electricity can only be obtained from Dominion Energy South Carolina, Inc. obtaining their medical care from healthcare providers outside of the State of South Carolina discriminates against and excessively burdens interstate commerce and greatly financially burdens the particular people who are customers of medical professionals outside of the State of South Carolina. The requirements of the form act as a protectionist state policy that favors healthcare providers in the State of South Carolina over healthcare providers in any other state that have been chosen freely for health care by people living in residences in the State of South Carolina. Therefore, the requirements of the form discriminate against medical professionals located outside of the State of South Carolina. The requirements of the form seek to prevent the free flow of commerce between people in the State of South Carolina and other states within the United States.

This violation of the Commerce Clause of the United States Constitution particularly burdens the elderly and disabled residing in the State of South Carolina who are most likely to have underlying medical problems which therefore leads to a violation of the American with Disabilities Act.

The Americans with Disabilities Act (ADA), which became law in 1990, is a civil rights law that "prohibits discrimination against individuals with disabilities in all areas of public life, including jobs, schools, transportation, and all public and private places that are open to the general public. The purpose of the law is to make sure that people with disabilities have the same rights and opportunities as everyone else. The ADA gives civil rights protections to individuals with disabilities similar to those provided to individuals on the basis of race, color, sex, national origin, age, and religion. It guarantees equal opportunity for individuals with disabilities in public accommodations, employment, transportation, state and local government services, and telecommunications. The ADA is divided into five titles (or sections) that relate to different areas of public life."

The Americans with Disabilities Act Amendments Act (ADAAA) became effective on January 1, 2009. The ADAAA made a number of substantial changes to the definition of "disability."

Title II of the American with Disabilities Act relates to State and Local Governments. This title prohibits discrimination "against qualified individuals with disabilities in all programs, activities, and services of public entities. It applies to all state and local governments, their departments and agencies, and any other instrumentalities or special purpose districts of state or local governments." This title "outlines the administrative processes to be followed, including requirements for self-evaluation and planning; requirements for making reasonable modifications to policies, practices, and procedures where necessary to avoid discrimination; architectural barriers to be identified; and the need for effective communication with people with hearing, vision and speech disabilities. As with all aspects of the American with Disabilities Act, Title II is regulated and enforced by the United States Department of Justice.

According to a statement within a press release dated July 26, 2012 from the Civil Rights Division of the United States Department of Justice, "The Civil Rights Division and U. S. Attorneys' offices have long enforced the ADA in this area. This nationwide initiative seeks to focus and leverage the Department's resources together and aggregate the collective message that disability discrimination in healthcare is illegal and unacceptable."

The regulation passed by the Public Services Commission of the State of South Carolina permitting the Dominion Energy South Carolina, Inc. "Smart Meter Upgrade Opt Out Medical Waiver" form to require a person who lives in a residence in the State of South Carolina to have his or her medical conditions and records reviewed and verified only by "a licensed Healthcare Provider in the State of South Carolina" specifically discriminates not only against the poor but also against the elderly and disabled who are most likely to have ongoing medical problems who choose to obtain their medical care from healthcare providers outside of the State of South Carolina. For any person who resides in the State of South Carolina and obtains his or her medical care outside of the State of South Carolina, it would cost that person potentially thousands of dollars to find a doctor within the State of South Carolina who would be able to review that individual's medical records and write a statement about the medical problems since the South Carolina doctor would not have no prior relationship with that individual. Such a cost would not be covered by any medical insurance because there was not a medical reason for seeing a doctor who did not provide required medical care but was necessary to review medical records only because of the discriminatory requirement demanded by Dominion Energy South Carolina, Inc. Therefore, the aforementioned requirement greatly discriminates against the poor, the elderly, and the disabled which is a violation of the United States American with Disabilities Act.

As stated in the initial complaint paperwork "Not only would the cost be prohibitive but just finding a doctor to review medical records is almost impossible in the State of South Carolina. We know someone who has tried for years to find a South Carolina doctor who would be willing to review a person's medical records to do a Nexus statement in regard to a veteran for the United States Department of Veterans Affairs and has not been able to find a doctor to review those medical records although the majority of the medical records were established in the State of South Carolina."

The answer submitted by Mr. Matthew W. Gissendanner of Dominion Energy South Carolina, Inc. to the Complaint we made to the Public Service Commission State of South Carolina also did not consider any of the following facts that we had initially stated with respect to the aforementioned problem of the Dominion Energy South Carolina, Inc. "Smart Meter Upgrade Opt Out Medical Waiver" form only being signed by a health care provider that is licensed in the state of South Carolina:

1. Many people in the State of South Carolina have doctors that are located in

another state rather than in South Carolina. For instance, people who live in Aiken and North Augusta, South Carolina often just see doctors in the Augusta, Georgia area. In addition, people who live in the Rock Hill, South Carolina area often just see doctors in the Charlotte, North Carolina area. It is discriminatory that people who live in these aforementioned areas would be required to pay thousands of dollars to find a doctor in South Carolina who would be willing to review their medical records and write a statement about their medical problems since the South Carolina doctor would have no prior relationship with the chronically ill individuals.

2. People in the State of South Carolina who go to military hospitals and Department of Veterans Affairs hospitals do not have doctors that are necessarily licensed in the state of South Carolina. Military and civilian doctors in military hospitals are licensed in their home states – not the state in which the military hospital or clinic is located. Therefore, active duty military personnel and their family members, military retirees and their family members, and military veterans could be discriminated against and denied being able to opt out of the dangerous smart meter installation because their doctors very likely are not licensed in the state of South Carolina which is a requirement according to the Dominion Energy “Smart Meter Upgrade Opt Out Medical Waiver” form.

3. In order to save their lives and get the best medical care possible, many people from the State of South Carolina travel to doctors up to thousands of miles away for specialty care that may take weeks or months. People with particular types of cancer, heart problems, brain tumor and abscess problems, kidney problems, liver problems, etc. often go to such places as the Mayo Clinic, the Cleveland Clinic, the UCLA Medical Center, UPMC Children’s Hospital in Pittsburgh, etc.

The South Carolina citizens should not be discriminated against by not being able to be permitted to have their specialty doctors from any particular state sign the form.

4. With the pervasive lack of privacy in the United States it would be very easy for anyone within Dominion Energy or the Public Service Commission of South Carolina to verify that a doctor anywhere in the United States that signs the form has a valid medical license in a particular state.

5. Under the United States Constitution people are supposed to be free to pursue commerce in any of the states of this country without being punished in any way, shape, or form for doing so. The way that the Dominion Energy “Smart Meter Upgrade Opt Out Medical Waiver” form is written people who obtain electricity from Dominion Energy in the State of South Carolina are punished if they dare to obtain their medical care from doctors in another state. That is the company, Dominion Energy, with the approval of the Public Service Commission of South Carolina, punishing people for their constitutional right to pursue commerce within another state.

6. Besides people obtaining medical care from various states within the United

States there are also people who must out of necessity go outside of the United States in order to obtain care for extremely rare medical conditions. For instance, as of a few years ago the only two countries where a person could obtain surgery with respect to severe basilar impression were England and India. People who live in the State of South Carolina should not be denied the right to have their doctors who may be in another country sign the "Smart Meter Upgrade Opt Out Medical Waiver" form. With modern communication Dominion Energy or the Public Service Commission of South Carolina could easily call the doctor in another country to verify that he or she had signed the respective paperwork.

Contrary to the denial made by Mr. Matthew W. Gissendanner of Dominion Energy South Carolina, Inc., the complainant definitely alleges that the Dominion Energy "Smart Meter Upgrade Opt Out Medical Waiver" form requires people to agree to letting Dominion Energy contact the healthcare provider concerning the person's medical condition but there are no specifications on the limitations of access to a person's medical files. I was told that the statement on that form did not matter.

The patient is required to sign and agree to the following statement that is shown on the Dominion Energy South Carolina, Inc. "Smart Meter Upgrade Opt Out Medical Waiver" form: **"By signing below, I authorize Dominion Energy South Carolina to contact my healthcare provider concerning my MEDICAL CONDITION stated below."**

That sentence definitely is giving permission from the patient to any employee of Dominion Energy South Carolina to contact that patient's healthcare provider who is stated on the form to provide information about that patient's medical conditions. We contend that that statement would definitely make it seem to any health care provider that the provider would be permitted to provide to Dominion Energy South Carolina, Inc. any and all doctor notes, x-ray copies and reports, CAT scan copies and reports, MRI copies and reports, ultrasound copy and reports, etc. There is no limitation in that aforementioned authorization sentence.

Contrary to what Mr. Matthew W. Gissendanner states in his answer to our complaint, the above aforementioned sentence does not state in any way, shape, or form that the company only has permission to "contact the physician to confirm that the licensed physician did in fact provide his signature." If that were the case, the authorization statement would be as follows: "By Signing below, I authorize Dominion Energy South Carolina to contact my healthcare provider to verify that he or she has signed this form on behalf of the above listed patient."

As stated specifically in our original complaint, the Dominion Energy "Smart Meter Upgrade Opt Out Medical Waiver" form requires people to agree to let Dominion Energy contact the healthcare provider concerning the person's medical condition but there are no specifications on the limitations of access to a person's medical files. I was told that the statement on that form did not matter.

The following are the several problems related to this requirement which we stated in our original complaint to be discriminatory against people who have a home or are renting in the state of South Carolina:

1. The form does not state specifically any limitations that are put on Dominion Energy employees with respect to access to a person's medical files.
2. I was told that the statement on that form did not matter. Unfortunately, it certainly

does. Anything in writing supersedes any statements or promises that a person or organization may make with respect to any particular subject.

3. Without any limitations on what the doctor may tell Dominion Energy employees about the medical conditions of the person signing the "Smart Meter Upgrade Opt Out Medical Waiver" form Dominion Energy employees could legally demand that the doctor provide copies of any and all doctors notes, x-ray copies and reports, CAT scan copies and reports, MRI copies and reports, ultrasound copy and reports, etc. with respect to the patient which would be a huge invasion of privacy for Dominion Energy employees to have.

4. Dominion Energy employees should not be able to learn everything about a person's medical conditions in order to try to contradict the views of a licensed medical professional.

In his answer to part of our complaint Mr. Matthew W. Gissendanner of Dominion Energy South Carolina, Inc. misconstrues our argument with regard to the Dominion Energy "Smart Meter Upgrade Opt Out Medical Waiver" form requirements to provide specific information. Mr. Gissendanner's answer to our concerns that "This information is routine information that the Company - and many other businesses - have and use to make identity verifications and confirm that it is in fact communicating with its customer" has no relationship to our specific concerns and it seems as though that part of our complaint was either not read or not understood. Saying that other companies demand certain information so people should be glad to give private information to any entity is like saying other people have jumped off a bridge so you should be willing to do it also.

We respectfully request that the South Carolina Public Service Commission consider our concerns in regard to information and privacy as stated in our original complaint.

As previously stated, The Dominion Energy "Smart Meter Upgrade Opt Out Medical Waiver" form requires people to provide information that is unnecessary but can definitely lead to identity theft once the information is put into a computer. No computer is immune from attacks that will lead to all of the information being stolen from the computer to be used for espionage or identity theft. Periodically there is news about various companies having all of the information in their computers stolen and the information being sold on the dark parts of the Internet to be used for identity theft. With respect to the government several years ago the private information with respect to everyone in the Department of Veterans Affairs computer system was stolen. Even worse, all of the information about the history and relationships with other people of government employees who had top-secret security clearances were stolen from the Office of Personnel Management computers. No information in any computer is safe.

There are several problems related to this requirement which place people who live in a home or rental property in the state of South Carolina and have no option to obtain electricity from any other company than the monopoly Dominion Energy at risk with respect to their safety and security:

1. The "Smart Meter Upgrade Opt Out Medical Waiver" form that Dominion Energy requires to be provided to the doctor for signature has the house address and the service address and home telephone number printed on the form. For our safety and security except for utility companies and the County tax assessor we do not provide the house address to any organization, agency, doctor, hospital, company, etc. Dominion Energy should not be requiring people



to provide their location to a medical doctor since anything that a medical doctor signs that doctor is required to keep a copy of it in the patient's file. It is not safe for people to have their house address in medical records – especially since Obama required all medical records to be digitized and therefore easily stolen by Internet thieves. The medical waiver could easily be connected to the billing account number without providing unnecessary information to additional people.

2. The "Smart Meter Upgrade Opt Out Medical Waiver" form that Dominion Energy requires to be provided to the doctor for signature requires that the last four digits of a person's social security number and date of birth be given. If someone has a person's name, last four digits of the social security number, and the birth date that person's identity can easily be stolen. There should be no necessity for Dominion Energy to have the specific date of birth of a person. The year of birth should be sufficient although if a person has a medical problem or fragility that could cause the person to be negatively affected by the radiofrequency radiation from the smart meters the age of the person should really be irrelevant. The patient is going to have to send or hand carry the medical waiver to his or her doctor so the doctor already knows who the patient is without having to provide the patient's date of birth to the doctor.

3. The "Smart Meter Upgrade Opt Out Medical Waiver" form that Dominion Energy requires to be provided to the doctor for signature requires the last four digits of a person's social security number. Most doctors and hospitals do not use a person's social security number for identification. They use the number that the person is assigned by the insurance company. Even Medicare no longer requires a Social Security number to be used because of the danger of identity theft from using it. A person should not be required to provide the last four digits of the social security number to a doctor who does not have it. Again, it is just another way to increase the possibility of a person having his or her identity stolen. Dominion Energy should not be able to require the last four digits of a person's social security number if they do not already have it for the account holder person who applied for the electricity service in the first place or for a relative, family member, or friend who might live in the household and for which Dominion Energy definitely would not have that person's social security number.

4. The "Smart Meter Upgrade Opt Out Medical Waiver" form that Dominion Energy requires to be provided to the doctor for signature requires that the patient telephone number be provided. Many people may provide different telephone numbers to different organizations, family and friends, and medical providers. It is very sad, but because of the system required by Dominion Energy people with whom I have talked have stated that they are going to have to get a "burner phone" to temporarily use if they would be forced to provide the telephone number that they give to Dominion Energy to their doctor's office and be required because of the form to give the telephone number that they have provided to the doctor's office to Dominion Energy.

Completing the Dominion Energy "Smart Meter Upgrade Opt Out Medical Waiver" form should not put people – especially those who already have serious medical problems – in danger because of decreasing their safety and security.

**Relief Requested with respect to Complaint** with respect to major problems related to the discriminatory aspects and dangerous aspects of the Dominion Energy "Smart Meter Upgrade Opt Out Medical Waiver" form.

1. With respect to the requirement that the medical doctor that signs the Dominion Energy "Smart Meter Upgrade Opt Out Medical Waiver" form be licensed in the state of South Carolina, we respectfully request that any medical doctor properly licensed in any state of the United States or in any country that a person who lives in South Carolina and receives electricity from the monopoly Dominion Energy company goes to for medical care and the doctor can be reached by telephone and address by Dominion Energy employees should be permitted to sign the medical waiver form.
2. With respect to the requirement on the Dominion Energy "Smart Meter Upgrade Opt Out Medical Waiver" form that people agree to letting Dominion Energy contact the healthcare provider concerning the person's medical condition but there are no specifications on the limitations of access to a person's medical files, we respectfully request that limitations with respect to the information that Dominion Energy employees can obtain about the patient from the medical doctor be clearly stated. We respectfully suggest that the following limitations be clearly stated on the medical waiver form to show what the patient has agreed that the doctor may state to any Dominion Energy employee who may call the doctor:
  - A. The doctor may state that he or she does know the patient and acknowledges having signed the Energy "Smart Meter Upgrade Opt Out Medical Waiver" form.
  - B. The doctor may state that the patient would be adversely affected medically from the dangerous radiofrequency radiation emissions from a smart meter.
  - C. The doctor may state the main medical problems that the patient agrees to have revealed to the Dominion Energy employees.
  - D. The doctor may not provide any specifics with respect to the patient's medical problems nor provide any paper or digital copies of doctor notes, laboratory test results, x-ray copies and reports, CAT scan copies and reports, MRI copies and reports, ultrasound copy and reports, medications, etc.
3. With respect to the Dominion Energy "Smart Meter Upgrade Opt Out Medical Waiver" form requirements for people to provide information that is unnecessary but can definitely lead to identity theft once the information is put into a computer, we respectfully request that the form be changed in the following way:
  - A. Please remove the house address and the service address and home telephone number from the form. For identification purposes the entire account number could be shown because that would provide Dominion Energy employees with the relationship of the medical waiver to the service



address but not provide any critical theretofore unknown private information to a doctor, hospital, or insurance agency.

- B. Please do not require the last four digits of the patient's Social Security number. Most doctors or hospitals would not even have that since what is required now by doctors or hospitals is an insurance company number or a Medicare number that has absolutely no relationship to a Social Security number. A doctor or hospital does not need and should not be given that additional information. Many people who applied originally for South Carolina Electric and Gas service were not required to provide a Social Security number to South Carolina Electric and Gas so Dominion Energy having additional information about a Dominion Energy account holder is not going to help Dominion Energy to identify a customer. Instead that will provide Dominion Energy with information about a customer that they have no legitimate need to know. If the patient lives in the home with the account holder Dominion Energy has no legitimate need to know the last four digits of that person's social security number. The more computers that contain an individual's private information when there is no legitimate need for it to be in a company's or agency's computer, the more likely that that person will have his or her identity stolen.
- C. Please do not require the specific date of birth of the patient applying to opt out of having a smart meter installed because of medical reasons. If a criminal obtains from a computer the name and specific date of birth of an individual they are able to obtain the person's social security number and commit identity theft against that individual.
- D. There needs to be complete changes with respect to the "Smart Meter Upgrade Opt Out Medical Waiver" form. It appears that no safety and privacy considerations were adhered to when developing the form. If the patient is not the account holder, the current patient information section with the changes that we have suggested should be on a separate form provided by the patient to Dominion Energy because there is no reason for the health care provider to necessarily know the name and contact information of the account holder with whom a patient may be living. The only information that the doctor should be given by the patient is the name of the patient and the approval of that patient to allow the doctor to provide certain information to Dominion Energy with respect to a specific Dominion Energy account number.

Mr. Matthew W. Gissendanner of Dominion Energy South Carolina, Inc. sent a copy of his answer to our complaint and his request to dismiss our complaint to Mr. Christopher M. Huber, Esquire "(both via electronic mail and the U. S. First Class Mail w/ enclosure)." Please explain who this person is and if we are required to send a copy of this answer to this individual. If we are required to send a copy of this answer to Mr. Christopher M. Huber, Esquire please provide that person's and fax number to us.

It is extremely upsetting that it seems as though no "common sense" thought was given with respect to the requirements made and design of the Dominion Energy South Carolina, Inc. "Smart Meter

Upgrade Opt Out Medical Waiver" form. Therefore, I have had to spend dozens of hours of the precious hours that I may have left upon this earth in pain "typing" in order to bring to the attention of the members of the Public Service Commission of the State of South Carolina the alleged violations of federal law, the violations of privacy, etc. Inherent in the aforementioned apparently very poorly constructed form. Unlike Dominion Energy South Carolina, Inc. and the Public Service Commission of the State of South Carolina we do not have millions of dollars to pay lawyers hundreds of thousands of dollars per year to be able to fight against the thoughtless rules and regulations that are harming us and all the other individual citizens.

~~On top of regular medical problems I was injured recently and it makes it extremely difficult and painful for me to be able to reply to the highly paid Dominion Energy South Carolina, Inc. lawyer and associated personnel in his office available to work on this matter in just 10 calendar days. This is a formal request to the Public Service Commission of the State of South Carolina to provide us with information about how that required time period can be extended. Thank you very much.~~

I would like to be able to draft the design of a "Smart Meter Upgrade Opt Out Medical Waiver" form that I think would not be violating any laws, not be discriminatory, not violate anyone's privacy, and would be secure with respect to making sure that the medical provider signing the form had a valid medical license. However, with the stress and pain caused by and time taken to reply to the answer of Dominion Energy South Carolina I will not be able to do so for a while.

As stated in our original complaint with respect to this matter, the main purpose and responsibility of a legitimate constitutional government is to protect the citizens of a locality, state, and the entire country by enabling the citizens to be safe and secure with respect to all aspects of their lives so that the citizens can have life, liberty, and pursue happiness. Therefore, in making your deliberations we hope that you will take into consideration this responsibility.

Again, as stated in our original complaint with respect to this matter, we should not have to risk our lives by being forced to (1) have a smart meter installed which will cause additional medical problems and/or exacerbate the current chronic medical problems that we have or (2) live without electricity which would also cause a risk to our lives by being overheated from the lack of air conditioning in the summer, freezing from lack of heat in the winter, not being able to eat properly because of the lack of refrigeration, not being able to cook anything, not having any hot water for cleanliness, etc.

Thank you very much for taking the time to consider changing the discriminatory aspects and lack of privacy aspects of the requirements in the Dominion Energy "Smart Meter Upgrade Opt Out Medical Waiver" form which should help many people who apply for the opt out medical waiver remain safer and more secure in their homes.



CC: Mr. Josh Minges, Esquire of The Public Service Commission of the State of South Carolina  
(via United States Postal Service First Class Mail and via FAX 803-896-5199)  
Mr. Matthew W. Gissendanner of Dominion Energy South Carolina, Inc.  
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